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Thomas Doughty

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

THOMAS DOUGHTY,

Plaintiff,

v.

PELICAN INVESTMENT HOLDINGS,
LLC d/b/a AUTO SERVICE
DEPARTMENT,

Defendant.

Case No.: 8:24-cv-01926-FWS-ADS

**PLAINTIFF'S MOTION FOR
CLERK'S ENTRY OF DEFAULT**

Plaintiff Thomas Doughty ("Plaintiff") hereby requests that the Clerk of the above-entitled Court enter a default against Defendant Pelican Investment Holdings, LLC d/b/a Auto Service Department, ("Defendant Pelican") on the grounds that Defendant has failed to file an answer to the complaint within the time prescribed by the Federal Rules of Civil Procedure.

On September 1, 2024, Plaintiff filed the Complaint in this action. (ECF No. 1). On September 10, 2024, Defendant Pelican was served with a copy of the

1 Complaint and Summons in this action. (ECF No. 8). Plaintiff filed proof of service
2 on September 11, 2024. (ECF No. 8). On October 28, 2024, Plaintiff's counsel sent
3 a letter to Defendant at their registered agent's address, principal address, mailing
4 address, and former principal address, as stated by the California Secretary of State.
5 *See* Declaration of Jonathan Gil ¶ 3. The letter stated the procedural history of the
6 case up to that date. *Id.* Furthermore, it provided that "[i]f we do not receive a
7 response from you or your attorney within 14 days, or as mandated by the Court, we
8 will file a Notice and Motion for Default Judgment pursuant to FRCP 55(a)." *Id.*

9 To date, Plaintiff's counsel has yet to receive any communication from
10 Defendant in response to the lawsuit. Defendant's period to file a response has long
11 lapsed. Therefore, entry of default is appropriate, and Plaintiff moves the clerk to
12 enter default on Defendant in this action.

13
14 Respectfully submitted,

15 **KAZEROUNI LAW GROUP**

16 Date: November 5, 2024

By: s/Jonathan Gil
Jonathan Gil, Esq.
Attorney for Plaintiff